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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

TRADER JOE'S EAST INC.,
Plaintiff,

v.

Civ. No. 2:17-cv-05982

SELECTIVE FIRE AND CASUALTY
INSURANCE COMPANY,

Defendants

CIVIL ACTION

NOTICE OF MOTION FOR THE
ADMISSION OF COUNSEL TIMOTHY
CHURCH PRO HAC VICE

TO: Michael McDonnell, III, Esq.
Kutak Rock
1760 Market St., Ste. 1100
Philadelphia, PA 19103

SIR:

PLEASE TAKE NOTICE that the undersigned attorneys for plaintiff hereby applies to the Judge assigned to hear such matters at United States District Court for the District of New Jersey for an Order granting Admission of Counsel, Timothy Church, Pro Hac Vice.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Movants

show the following:

1. TRADER JOE'S EAST, INC. desires Timothy Church to provide counsel and be permitted to appear in any and all proceedings in the captioned case in association with James D. Carton, IV, Attorney at Law, upon granting of this motion.

2. Accordingly, Timothy Church seeks permission to participate in the captioned case and, in accordance with Rule 1:21-2 of the New Jersey Court Rules, files this sworn motion requesting permission to participate.

PLEASE TAKE FURTHER NOTICE that TRADER JOE'S EAST, INC. shall rely upon the Certifications of Timothy Church attached hereto as Exhibit "A" and incorporated by reference herein in support of this application which asserts that:

- a. Timothy Church is an attorney admitted to practice law in the State of New York.

- b. Timothy Church is an associate of the law firm of:

Bruckmann & Victory, LLP
420 Lexington Avenue, Suite 1621
New York, NY 10170
Telephone: (212) 850-8500
Facsimile: (212) 850-8505

- c. Timothy Church is presently an active member in good standing in the

State Bar of New York and has been a member in good standing since 1999;

- d. Timothy Church has never been the subject of any disciplinary action by the Bar or courts of any jurisdiction in which he is licensed;
- e. Timothy Church has never been denied admission to the courts of any State or to any Federal court;
- f. Timothy Church is familiar with the State Bar Act, the State Bar Rules, and the New Jersey Disciplinary Rules of Professional Conduct governing the members of the State Bar of New Jersey, and will at all times abide by and comply with the same so long as the above-captioned case is pending and said applicant has not withdrawn as counsel herein;
- g. Timothy Church will be co-counsel with New Jersey counsel, James D. Carton, IV, a partner with the Carton Law Firm, 40 Union Avenue, Manasquan, New Jersey 08736;
- h. Bruckmann & Victory, LLP have been requested by Trader Joe's East, Inc. to undertake this representation and has represented Trader Joe's East, Inc. in an attorney-client relationship for an extended period of time.

PLEASE TAKE FURTHER NOTICE that Timothy Church and James D. Carton, IV respectfully request that this Motion for Admission of Counsel Pro Hac Vice be

granted, that Timothy Church be permitted to participate in all proceedings in the captioned case pro hac vice, and for such other and further relief to which Trader Joe's East, Inc. may be justly entitled.

PLEASE TAKE FURTHER NOTICE that Trader Joe's East, Inc. requests that oral argument be waived and that this application is submitted for a ruling on the papers pursuant to Rule 1:6-2 unless there is opposition to this Motion, in which event oral argument is requested. A proposed form of Order is submitted herewith.

The undersigned will rely upon the attached supporting certification of counsel.

WE CERTIFY that the original of the within pleading has been filed with the Civil Clerk, United States District Court for the District of New Jersey and a copy has been electronically forwarded to **Michael McDonnell, III, Esq., Kutak Rock, LLP, 1760 Market St., Ste. 1100, Philadelphia, PA 19103.**

Oral argument is not requested unless opposed. A proposed form of Order is attached. There are no court dates scheduled.

CARTON LAW FIRM, L.L.C
Attorneys for Plaintiff

By


JAMES D. CARTON, IV

DATED: November 2, 2017